Chapter 8

Transportation

Chapter 8

Transportation

General Considerations

Chapter 8 of the DEIS was organized with two main subsections: Truck Traffic and Marine Traffic. To be consistent with the other chapters, these two subsections have been combined for the FEIS.

The revised section numbers are used to organize the following public comments that were received on Chapter 8 of the DEIS.

8.1 Primary Issues

No substantive comments were received that specifically address this section.

8.2 Affected Environment

8.2.1 Truck Traffic

Comment O-1.310

p. 8-2. Are gravel trucks leaving the site covered to avoid spillage during transit?

Ortman, David

Response

No, trucks are not typically covered. However, they could be required to cover loads if a problem were to arise during operation.

Comment O-1.311

Figure 8-1 shows projected background turning movement volumes. Please define "background turning movement volumes".

Ortman, David

Response

These numbers refer to the average number and direction of vehicles at major intersections near the site. The text of the FEIS has been revised to reflect this definition.

Comment O-1.313

This section states that on-island trucking activity will increase at an assumed rate of 2.5 percent per year. If this is the case, why does it state in Sec. 8.2.1.2 Existing Traffic Volumes on page 8-1 state that "Truck trips currently generated from the site amount to approximately 500 to 1,000 year truck trips. A background growth rate of 2.0 percent, derived from historical King County average daily traffic counts, was used in the analysis." Please explain why a figure of 2.0 percent is used in Sec. 8.2.1.2 and a figure of 2.5 percent per year is used in Sec. 2.2.6. Who performed the analysis referred to in Sec. 8.2.1.2?

Ortman, David

Comment O-1.314

8.2.2.p.8-2 Why is a growth rate of 2.0 percent used for background traffic? How does historical King County average daily traffic counts measure up against traffic on an island system such as Maury/Vashon Island?

Ortman, David

Response

The analysis is based on a 2.5 percent increase. Chapter 8 in the FEIS has been revised to reflect this. This 0.5 percent difference is inconsequential to the analysis. Section 8.2.1 of the DEIS states that the analysis is based on the Level One Traffic Analysis prepared by TDA and including in the SEPA Checklist prepared by the Applicant.

Comment

Why does this section state that trucking activity would increase at a rate of 2.5 percent per year when it states on page S-3 that "At some point, the increase in extraction for the local market would slow and eventually halt, since demand for sand and gravel within the confines of Vashon/Maury Island is limited?" Please correct this statement.

Ortman, David

Response

The local market would not slow and eventually halt; rather, the *increase* in the local market would slow and eventually halt. The increase in trucking would eventually stop at a maximum of 20 trucks per day.

This estimate was provided by the Applicant based on market expectations. Vashon/Maury Island is growing, as is the rest of King County, so some increase in trucking should be included in the analysis. The exact amount cannot be predicted because it depends on development and related issues such as the economy. The Applicant indicated that an absolute maximum number of

truck trips per day would be 20, so this is the level that is addressed in the EIS.

8.2.2 Marine Traffic

8.2.2.1 Definition of Study Area

Comment O-1.322

8.3.1 p.8-4. It states that an independent review of the marine route was prepared by Art Anderson Associates. Who paid for this review?

Ortman, David

Response

As stated in the DEIS citations list, the marine route study was included as Appendix G to the Environmental Checklist prepared by the Applicant.

8.2.2.2 Puget Sound Vessel Traffic Service

Comment O-1.326

This section states that the VTS system does not cover Colvos Passage. However, according to Appendix F, "SCOPING RISK ASSESSMENT Protection Against Oil Spills in the Marine Waters of Northwest Washington State", 18 July 1997 (prepared by Environment Engineering Division, John Volpe National Transportation Systems Center, USDOT), "VTS has radio coverage throughout waterway; radar covers all TSS and "shadows" only in Hood Canal, in Rich Passage, inside the San Juans, south of Tacoma, and east of Whidbey Island." Table 4-2 (p. 52). Please explain why this study implies that VTS coverage extends to Colvos Passage?

Ortman, David

Response

The Vessel Tracking System (VTS) does not cover Colvos passage with radar. However, vessels using Colvos passage are required to report their position by radio as part of the Vessel Movement Reporting System (VMRS). This information is then incorporated into the overall vessel traffic management system.

Comments O-1.327

It states that the VTS system does cover the East Passage. Why then is vessel traffic data unavailable for East Passage?

Ortman, David

Comment O-1.329

p. 8-8 It states that "Although data on marine traffic movements are tracked by various parties for different reasons, combined data

for all traffic types are difficult to obtain." While we agree that the Coast Guard is a poor source for marine traffic movement, there is no excuse for Jones & Stokes to be using near decade old estimates (i.e. 1991 Coast Guard analysis). It is particularly irritating that King County has retained Jones & Stokes to produce a DEIS that contains such outdated information and that citizens are required to provide additional data that Jones & Stokes was unwilling or unable to locate.

Ortman, David

Comment O-1.325

8.3.1.5 p. 8-7. This section states that the data on the numbers of tugs and barges using Colvos Passage or the East Passage were not available.

Ortman, David

Response

Additional traffic data for East Passage and Colvos Passage for the time period April 1999 to April 2000 is included in Section 8.2.2.4 and Appendix L of the FEIS. The data on vessel activity was provided by the Coast Guard.

8.2.2.3 Shipping Trends in the Study Area

Comment G-3.031

31. Chapter 8. It is naive to suggest that the level of barge traffic proposed for the East Passage would not significantly increase the risk of a fuel or oil spill. Contrary to the statement in 8.3.1.3, Shipping Trends, large ships do not "often try to use Colvos Passage."

People for Puget Sound

Response

The quote in the comment above has been removed from its context. The full sentence reads, "To save time, ships and barges that travel northbound from the Tacoma area often try to use Colvos Passage and do not sail by the project site". Within the same section (Section 8.3.1.3 in the DEIS; revised to Section 8.2.2.3 in the FEIS) it is stated that "fewer oil-carrying vessels and very large vessels use Colvos Passage". Additional data for the time period from April 1999 to April 2000 have been included in the FEIS in Section 8.2.2.4 and Appendix L.

8.2.2.4 Volume of Ship Activity

Comment O-1.324

8.3.1.4. p. 8-7. This section states that only 17 ships greater than 3,000 tons arrived in Olympia during 1998. Why was 3,000 tons picked? What is the total number of ships of any size calling on the Ports of Tacoma and Olympia during 1998?

Ortman, David

Response

The barges most likely to be used at the Maury Island mining facility have 10,000-ton capacity. The 3,000-ton ship size referred to in the DEIS was intended to give a general sense of the volume of similarly sized vessels traveling through the area. Additional information regarding vessel traffic volume and vessel size can be found in "Scoping Risk Assessment: Protection Against Oil Spills in the Marine Waters of Northwest Washington State", 18 July 1997 (prepared by Environment Engineering Division, John Volpe National Transportation Systems Center, USDOT).

The basis of the conclusion in the DEIS is primarily related to the adequacy of the existing VTS. Section 8.2.2 of the FEIS provides more detail about this system as well as more recent data on tug/barge and deep draft vessel traffic volume in the Maury Island vicinity.

Comment O-1.330

For example, more up to date information is contained in the "Addendum - Report to Congress on International, Private-Sector Tug-of-Opportunity System (ITOS) for the Waters of the Olympic Coast National Marine Sanctuary and the Strait of Juan de Fuca" by the U.S. Coast Guard, December 1997. Appendix F to this report, "SCOPING RISK ASSESSMENT Protection Against Oil Spills in the Marine Waters of Northwest Washington State", 18 July 1997 (prepared by Environmental Engineering Division, John Volpe National Transportation Systems Center, USDOT) contains the following information:

Relative to other areas of the waterway, the highest probability of accidents which could result in serious oil spills is in Puget Sound from Admiralty Inlet to Tacoma [Segment 7]. (Ex. Summary p. xiii).

All areas of the [northwest Washington State marine] waterway are highly sensitive to oil spills because of the richness and diversity of marine life, the economic and cultural value of fin and shell fisheries, and aesthetic and recreational values. (Ex. Summary p. xiii).

Risk, as measured by accident probability and likely consequences in the event of accidental oil spillage, is highest in Puget Sound from Admiralty Inlet to Tacoma [Segment 7], due mainly to high traffic density and the preponderance of historical accidents there. (Ex. Summary p. xiv).

Most accidents (96%) occur in Segments 4-9, east of Dungeness, primarily Segment 7.

In segment 7 (Puget Sound from Admiralty Inlet to Tacoma), the high rating is due primarily to the very high accident likelihood rating. Traffic management and spill response systems are mature in this area, but the accident likelihood suggests that further spill prevention efforts may be necessary. p. 87

According to table 3-1 (p. 37) of this study, Segment 7 (the southern part of Puget Sound from Admiralty Inlet to Tacoma) had the biggest share of vessel traffic in 1993 by a factor of 10.

Ortman, David

Comment O-1.335

This section of the DEIS must be amended to add the information provided in the 1997 Volpe Study.

Ortman, David

Comment

Additional barge and tug operations also increase the risk of maritime collisions and oil spills

Felleman, Fred, Ocean Advocates

Comment O-1.331

Adding the subjective judgments for military and unregulated vessels shift the total results only slightly. Otherwise, they remain the same, with Segment 7 clearly the busiest.

Ortman, David

Response

The conclusion reached in the DEIS is that the existing vessel traffic management system is adequate to handle the additional traffic that would be generated by the operation. This conclusion is supported by conversations with local experts at the U.S. Coast Guard (see Appendix L) and the Washington State Ferry System.

There are many potential data sources for marine traffic movement, but the variability in reporting methods and data collection rationale complicate interpretation. The data used in the DEIS are intended to provide sufficient basis to assess potential environmental impacts, and, specifically, risks of collision, wake effects, and impacts to the State ferry system. Although some of the estimates used in the DEIS were from older sources, the representation of vessel traffic volume remains accurate. In fact, traffic volumes in the project area have decreased slightly in recent

years as trends in the shipping industry have changed. More recent data on shipping volumes in the East Passage and Colvos Passage for the time period from April 1999 to April 2000 have been provided by the Coast Guard, and are included in the FEIS as Appendix M. These data are incorporated into the analysis in Section 8.3.2.2 of the FEIS.

According to the Volpe (1997) study, traffic levels in Segment 7 (southern Puget Sound from Admiralty Inlet to Tacoma) are considered high. However, a significant portion of this traffic remains in the Seattle area and does not pass near the project site. The traffic management system is considered mature in this segment. The additional vessel traffic generated by the project would not raise traffic volumes near the site close to the levels of traffic routinely managed in the Seattle (Elliott Bay) area of Section 7. Additionally, even barges traveling from the site into the Seattle area would not significantly tax the traffic management system already established.

The critical point that remains valid in supporting the conclusions in the EIS is the adequacy of the existing traffic management system to handle the additional traffic generated by the operation without a significant increase in risk of accidents or collisions.

This is not to say that there is no risk or no increase in risk of accident or collision associated with the increased vessel traffic from the project. Each additional vessel increases the likelihood of an accident or collision, however, based on the existing capacity of the traffic management system, there is not a "significant" risk or increase in risk associated with the proposed project.

Comment O-1.336

In addition, this section notes various vessel accidents in "central Puget Sound" but fails to provide any information on vessel accidents in the Tacoma area. For example, there was a recent freighter grounding on Anderson Island. Please provide documentation on all vessel accidents within the last ten years, including loss of power, in both the "central Puget Sound" and "Tacoma area".

Ortman, David

Comment O-1.340

Another study that should have been reviewed and discussed by Jokes & Stokes is "The Washington State Ferries Risk Assessment - Final Report", 1 July 1999, prepared by the George Washington University, et al. for the Washington State Transportation Commission. According to this study, there have been 237

accidents in Puget Sound over the past ten years, 46 involving Washington State Ferries and 191 involving non-WSF vessels. (p. 37) at least one ferry collisions with a tug and tow is listed in Table 2. (p. 38): 9/10/94 Ferry Issaquah collides with an unlighted tug/tow shifting the tow enroute to Southworth. Please identify the owner and contents of tow for this collision.

Ortman, David

Response

Each accident has a unique set of precipitating factors. Because the conclusions in the EIS are based primarily on the adequacy of the existing vessel traffic management system, analyzing each accident would not provide substantive additional information. Recent analyses of risk for oil spills do not suggest changes to the existing vessel traffic management system. In fact the system is characterized as "mature" for the area in question. The increase in marine traffic generated by the proposed project would not strain the VTS system.

Comment G-3.033

33. Section 8 3 1 4. This section states that a ship travels past the project site "every 4.8 hours". Obviously, each ship does not pass instantly. The actual time it takes a ship to pass the site should be used for this analysis, not merely the departure time, since the potential for a barge to intercept a ship is not instantaneous. This "point of departure" math is carried on in section 8.3.2.2, Increased Risk of Collisions or Spills, with the "probability of a departing tug/barge encountering a southbound oncoming vessel" calculated using the "point of departure" figure of one barge each six hours. This calculation is crude, to say the least, as it fails to account for speed, trajectory or size of vessel.

People for Puget Sound

Response

The volume of shipping activity and associated calculations are not meant to be representative of a statistical probability of collision but rather to be representative of the traffic volumes and potential vessel encounter rates. As such the calculations support the conclusion that the current vessel management system can adequately handle the traffic load from the proposed barging.

8.2.2.5 Tug and Barge Activity

Comment O-1.328

It states that due to the slow speed of tugs and barges "they have considerable time to respond to obstacles, and other vessels have considerable time to respond to them." However, loss of power,

poor visibility and problems with communication are all factors leading to collisions regardless of "response time". Please delete this sentence from this section.

Ortman, David

Response

Comment noted and the sentence has been removed from the FEIS. However, vessel speed is a relevant factor for collisions and to a lesser extent powered groundings. On the other hand, slow speed also increases the exposure to other traffic while crossing traffic lanes.

Comment G-3.032

32. Section 8 3.1.5. It should be noted that this section cites the Volpe study, which People for Puget Sound has identified as fundamentally mathematically flawed. It is interesting that the Coast Guard does not appear on the distribution list for this DEIS. Has the Coast Guard already signed off on the proposal? Have they done their own analysis of vessel safety?

People for Puget Sound

Response

In response to this comment, discussions were held with the U.S. Coast Guard. Chapter 8 of the FEIS has been revised based on discussion with the Coast Guard department in charge of the Puget Sound Vessel Traffic Service. The Coast Guard's review of the DEIS is included in the FEIS as Appendix M, and the information has been incorporated into the analysis in Chapter 8.

The Coast Guard concluded that the Vessel Traffic Service Puget Sound would be capable of handling the "modest increase in barge traffic described in the EIS."

8.2.2.6 Ferry Activity

No substantive comments were received that specifically address this section.

8.3 Impacts

8.3.1 Truck Traffic

Comment I-17.009

(repeated) (The DEIS) states that on-island trucking would remain about the same. … yet it said that the proposal would involve trucking … water onto the site every day—the study appears to

contradict itself here.
Putnam, Joshua

Comment I-17.037

… non mention of … impact of trucking onto the site for the dust mitigation … are these water trucks silent … ? Either trucking of travel must stop, or the water trucks have been left out of the impact study.
Putnam, Joshua

Response

One or two water trucks a day would not significantly affect traffic.

Comment

Lone Star intends to barge gravel off site. While this is feasible most of the time, the intended dock site is exposed to southerly storms, which in the wintertime are quite common. What happens if they damage their dock during one of these storms, and the barge cannot haul the gravel for several days, maybe a week? The current highway/ferry system on Vashon as well as Fauntleroy cannot handle anywhere near the scale of trucking that would be required to haul the gravel off-island.
Parrott, Jonathan

Response

The Applicant does not intend to truck gravel off of Vashon–Maury Island. Truck deliveries on the island would not exceed 20 trucks per day. In the event that the dock became unusable, large-scale deliveries would be suspended.

Comment O-1.315

It states that the applicant has confirmed that no off-island trucking will occur from the mine. How has the applicant "confirmed" this? How binding and enforceable is this "confirmation"?
Ortman, David

Comment

The draft EIS falsely presumes that ALL of the gravel will be barged off. This is not true. Regardless of what Lonestar now claims, there can be no doubt that much of the gravel will be trucked off the island. Why? Because Lonestar will sell gravel to interests in Kitsap, Pierce and Thurston counties - areas not served by the proposed barging operation. Further, there will inevitably be period where the barging operation is broken down, or delayed, or cannot meet the current demand. Whenever this happens, hundreds of heavy-duty trucks will descend on Maury Island - clogging the ferry system, ruining the roads, and creating dangerous conditions for other drivers and pedestrians. Also, I

believe that you should consider the noise impact of the trucking operation on Maury and Vashon Islands.

Engelhard, Scott J.

Comment

The impact statement makes no mention of the fact that the gravel that is to be shipped out from this pit has to make landfall some where. How does this gravel get transported from the landing site to the fill site. Assuming that a truck/trailer combination can carry approximately 50 yards per haul, this amounts to 400 truck runs PER DAY. Where in our already overtaxed highway system can this amount of traffic be carried without affecting many other people.

Parrott, Jonathan

Comment

Delivery and transportation of mined materials to the mainland of King County, and the resulting environmental impacts there, are not even addressed by the Stokes & Jones document. Also ignored by the DEIS is any plan for land reclamation and restoration at the Maury site.

Gylland, Barbara and Fred

Response

Offsite delivery impacts are outside the scope of this EIS. Off-island trucking was not mentioned in the application, and King County is not considering the impacts from, or permitting of, off-island trucking. Off-island trucking would be considered a major project modification subject to SEPA review. The operator and purchaser at the receiving end would need to arrange delivery, including SEPA compliance, on a case-by-case basis.

Comment

Truck Traffic/Proposed Action: Please add the impacts of construction, not just operation to this section.

Ortman, David

Response

Construction would not generate significant volumes of traffic, nor would it impact traffic use in the vicinity of the project. Therefore, this impact is not included in the EIS.

Comment C-8.075

8 2. #75. Not included in this or any other section is an analysis of the impact of hauling top-soil to the site to replace the 271,000 cubic yards excavated and contained as contaminated soils. There are vague references to possible manufacture of topsoil onsite. Without any guidelines, it is difficult to assess the potential volume of topsoil to be trucked to the site. In Phase 1

and 2, 46,000 cubic yards of material would be removed and contained. If this entire volume were replaced by trucked in topsoil, it would require approximately 6,000 truckloads of material (10 tons/truck for 62,560 tons of material). For the entire project approximately 36,000 truck trips would be required. Because of the volume and number of trips necessary to provide a replacement of topsoil, some analysis is required to provide a basis for evaluation and comment before decisions are made to approve this project. Please provide an analysis and discussion of same.

Vashon-Maury Island Community Council

Response

With madrone reforestation, little topsoil would be required, since madrone requires mineral soil. Even if topsoil were required, the number of trucks would not significantly affect local traffic and, therefore, were not addressed in the EIS.

Comment C-8.022

(repeated in 2.2.3, 3.4.2, 4.3.2, and 10.3.4). Access roads to the site should be paved to prevent dust. Will a washing system for trucks be required, and if so, what requirements will the system have? Where will water be obtained? How will leachate be handled? Provide specifications for the wash down system and discuss monitoring of toxics. Will a monitoring well be placed near the wash down system, and how frequently will monitoring occur? Will the water requirements of this system involve truck traffic? If so, reflect this additional issue.

Vashon-Maury Island Community Council

Response

The mitigation measure of paving is no longer included in the EIS, since it was not tied to a specific adverse impact. Details regarding management of arsenic and other materials would be worked out as part of the grading permit.

Comment

There needs to be study done not only on the immediate vicinity of the mining but also in the areas that will be effected during the "movement" of any such gravel and sand.

Chilbert, Mark

Response

On-island movement of sand and gravel by truck is addressed in Section 8.3.1 of the FEIS. As noted in Chapter 2 and in Section 8.3.1, truck traffic at off-island delivery points would be addressed as part of projects at delivery points.

Comment I am extremely concerned to the effects of increased dump truck and other sand and gravel equipment would effect the safety of my children waiting closely by the road. In addition to violations of speed, many other sand and gravel trucks were seen crossing onto the shoulder of the road. … I can say without any hesitation that every single dump truck and sand and gravel truck that was observed exceeded the posted speed limit of 40 miles per hour by at least 15 miles per hour. Many were observed going 20 miles over the posted speed limit.

Chilbert, Mark

Response Speeding is a matter to be addressed by local law enforcement.

Comment 8.9.4. Will all of the proposed markets utilize trucks to unload the barges (thus limiting the maximum movement of material in a day)?

Kuperberg, J. Michael, Ph.D.

Response No. Some projects may require trucks, others may not.

Comment 8.3.1. It is not clear how the shifts associated with 24 hour/day operations are included in the traffic estimates.

Kuperberg, J. Michael, Ph.D.

Response The effects of changes in operational hours on traffic are addressed under Alternatives 1 and 2.

8.3.2 Marine Traffic

Tug Approach and Departure

Comment C-4.020 The DEIS shows the routing of tugs and barges to a point 500 feet in front of the dock when leaving or approaching the dock. That is unnecessary, as the vessels could proceed to near the VTS lane 1400 feet out, and turn and to enter the lane at a shallow angle.

Vashon-Maury Island Community Council/Thomas McKey

Response Comment noted.

8.3.2.1 Assumptions

No substantive comments were received that specifically address this section.

8.3.2.2 To what extent would tug and barge traffic affect or be affected by other boat traffic on Puget Sound, including increased risk of collisions or spills?

Comment

Obviously, any delivery of fill to SeaTac or the Duwamish would involve crossing the shipping lanes of the East Passage. With 24-hour barging proposed, an accident could easily happen, with huge impacts to already-stressed marine species. The fact that barges would cross the East Passage is obfuscated in the early portions of this chapter, which tries to suggest that the presence of the shipping lanes would facilitate safety. This would be true if the barges were leaving from a port facility and terminating at a port facility—which is not the case, as evidenced by section 8.3 3 2, Additional Measures, which identifies Des Moines as a "high-potential delivery point".

People for Puget Sound

Response

Section 8.2.2.1 of the FEIS (Section 8.3.1.1 of the DEIS) states "... it is expected that most traffic, over the life of the project, would travel between the Seattle area and Tacoma via the East Passage". The chapter does not suggest shipping lanes alone facilitate safety but that the VTS, which tracks vessels, requires departure and route reporting, and includes shipping lanes, would facilitate safety. All tugs/barges from Maury Island would be required to fully participate with the VTS.

Comments G-5.015

15. What are the impacts to Puget Sound if a barge tips over? Didn't this happen during a Lake Union construction effort? Why were no meaningful assessments made of impacts of barge accidents?

Citizens Against SeaTac Expansion

Comment O-1.341

of considerable concern is the fact that "Despite the need for effective accident response and consequence management, the Washington State Ferries, the Coast Guard, and other public safety agencies have not fully developed and exercised the plans and procedures required for an effective, immediate, and coordinated response to a catastrophic event." (p. 10)

Ortman, David

Response

Safety measures to prevent accidents and protect human life and the environment are established by the U.S. Coast Guard and all vessels are required to abide by these regulations. In the unlikely event that a barge were to overturn or be involved in an accident, impacts from spilled gravel would be minimal in most areas. Sensitive areas that may be negatively impacted by a large scale spill (e.g., eelgrass beds) are typically located close to shore. Barges are located close to shore only during loading/offloading and dock approach and departure. However, power loss or grounding is a potential risk, especially in areas such as Robinson Point, where the traffic lanes are located close to the shore. Section 6.4 includes an additional measure to minimize the risk of spillage in these sensitive areas.

Comments O-1.345

Tug Traffic/Proposed Action: It also states that there are requirements for contractors transporting mined material to sign an agreement that strictly prohibits oil/fuel dumping, etc. Please provide a copy of this agreement. What agency enforces such agreements? How is reporting and monitoring of such agreements carried out? Are such agreements required under any Federal or state laws? If so, what are they?

Ortman, David

Comment O-1.338

8.3.2.2. p. 8-10 and 8.3.3.1 p. 8-12. These sections states that contractors transporting mined material would sign an agreement that strictly prohibits oil/fuel dumping and includes provisions for accidental-spill response procedures and other requirements. How would this agreement be enforced? Who would the contractors sign the agreement with?

Ortman, David

Response

Existing regulations prohibit fuel and oil dumping and require emergency spill response preparations. These regulations are enforced by the Coast Guard.

Comments O-1.351

8.3.4. p. 8-13. This section has not taken into account weather data including shipments when fog reduces visibility. Increased risk of collisions from this condition must be included.

Ortman, David

Comment O-1.339

8.3.2.4. p. 8-11 This section states that ferry runs would not be disrupted by ferry operations. Is it correct that loaded barges are some of the lowest vessels above the water line transiting Puget

Sound and therefore the hardest to see? Appendix F, "SCOPING RISK ASSESSMENT Protection Against Oil Spills in the Marine Waters of Northwest Washington State", 18 July 1997 (prepared by Environmental Engineering Division, John Volpe National Transportation Systems Center, USDOT) also estimates that there are 4 days/month with visibility due to fog of less than ¼ mile. What additional risk from barge traffic to Puget Sound ferries will occur due to lack of visibility?

Ortman, David

Response

The DEIS concluded that the existing VTS is well prepared to handle the increased marine traffic generated by the project. This system is intended to be functional in all weather conditions. Appropriate warning and operating requirements are incorporated into the VTS system. For example the VTS User Manual (U.S. Coast Guard, 1998) states "During conditions of vessel congestion, restricted visibility, adverse weather, or other hazardous circumstances, a VTS may control, supervise, or otherwise manage traffic, by specifying times of entry, movement, or departure to, from, or within a VTS area."

Comment A-1.030

Section 8.3.2.2 p. 8-9 The effect of tug and barge traffic on recreational boat use should also be considered. A towing method involving long lines between the tug and barge may be a potential hazard from recreational users cutting between tug and barge. The tug-alongside-barge configuration will reduce/eliminate this hazard.

Washington Department of Natural Resources

Response

In response to this comment and information provided by the U.S. Coast Guard (Appendix M) additional analysis has been added to the FEIS on impacts to recreational watercraft (Section 8.3.2.2).

Comment O-1.344

Tug Traffic/Proposed Action: It states that no significant impact is expected because of Coast Guard vessel traffic monitoring requirements. Reliance on the Coast Guard is not an adequate explanation of "no significant impacts". For example according to an 8 March 1999 Seattle P-I article, "Test results indicate oil now washing ashore on beaches from the central Oregon Coast to as far north as southern Washington came from the New Carissa [a freighter which grounded off the Oregon Coast]. Coast Guard officials, confronted with three dead, heavily oiled birds last week, said the oil was different from that aboard the New Carissa. They

even hinted that the birds, turned in by George Roza of the Waldport area, might have been a hoax." The willingness of the Coast Guard to ignore evidence and attack concerned citizens is explained by the Coast Guard's own incompetence. According to a 16 May 1999 Seattle Times article, the Coast Guard's failure to take oil samples from the New Carissa grounding in Oregon "could make it difficult for state and federal agencies to measure any long-term environmental damage."

Ortman, David

Response

The conclusions about the adequacy of the VTS are based on accident rates, independent evaluations such as the Volpe study (John A. Volpe National Transportation Systems Center 1991), and concurrence from the Coast Guard regarding their ability to handle the increased traffic generated by the proposed project.

Comment G-5.016

16. How much will the required additional Coast Guard staff cost to monitor the large increase in Sound traffic? Why was there no mention of the increased staffing that would be needed?

Citizens Against SeaTac Expansion

Response

No additional Coast Guard staff would be required to monitor marine vessel traffic generated by the proposed project. The current VTS system is adequately designed and staffed to accommodate the increases in traffic.

8.3.2.3 Would tug/barge tows cause wake effects?

No substantive comments were received that specifically address this section.

8.3.2.4 How would the addition of barge traffic affect the Washington State Ferry System?

Comment I-17.038

… claims that only the Vashon/Fauntleroy ferry route would be crossed by any barge traffic from the site. This is false … Southworth/Fauntleroy … Vashon/Seattle.

Putnam, Joshua

Comment O-1.342

In addition, there are numerous examples of reverse propulsion (braking) failure on Washington State Ferries. The proposed project will add risk, particularly to the Fauntleroy/Vashon ferry run. Therefore, in view of the findings of the Washington State Ferries Risk Assessment Final Report, the DEIS must address a

possible catastrophic accident involving a tug/barge and a passenger ferry.

Ortman, David

Comment O-1.348 Barge Traffic-WSF/Proposed Action: It states that there is a potential for momentary delays of some ferry routes. Please quantify this delay. Please quantify the number of ferries that could experience delays each day.

Ortman, David

Comment C-12.019 The 24-hour barge traffic seems a major concern to the ferry system.

St. George, Brian

Response Consultations with Washington State Ferries indicated that ferries generally yield the right-of-way to commercial vessels and that momentary delays can be caused by evasive maneuvers. However, slow barges, which are easily avoided, are not given the same amount of clearance as ships and therefore these delays are not expected to be significant.

8.4 Adverse Impacts and Mitigation

Comment O-1.359 Tug Traffic/Mitigation: The fact that Jones & Stokes has listed Des Moines as "a high-potential delivery point for the Proposed Action", is contradicted by a 15 May 1999 Seattle P-I article stating, "A unanimous vote by the Des Moines City Council has killed a proposal to use a conveyor belt to lift gravel from barges on Puget Sound to the new third-runway site at Sea-Tac Airport." The draft EIS was not released until 21 July 1999. This means that Jones & Stokes knew that Des Moines was no longer "a high-potential delivery point for the Proposed Action", but chose to leave this statement in the DEIS anyway. This statement should be deleted from the Final EIS.

Ortman, David

Response Comment noted. Des Moines is still a likely delivery point for the project.

Comment O-1.350 Tug Traffic/Mitigation: It states that the owner should require normal reporting of arrival/departure activities for all tugs serving the dock and Des Moines (a high-potential delivery point for the Proposed Action). Jones & Stokes has concluded elsewhere that it need not address impacts of off-island deliveries of "sand and

gravel" ("... specific impacts of off-loading materials would be addressed under SEPA on a case-by-case basis, within the jurisdiction where trucking or construction would occur." Sec. 8.3.4, p.8-13). However, when it is to the benefit of Taiheijo Cement Corp. to imply that they have a high-potential delivery point for the Proposed Action, Jones & Stokes is happy to include it in this section. This documents that Jones & Stokes has biased the DEIS in favor of Taiheijo Cement Corp.

Ortman, David

Response

Comment noted.

8.4.1 Significance Criteria

No substantive comments were received that specifically address this section.

8.4.2 Measures Already Proposed by the Applicant or Required by Regulation

Comment O-1.349

Tug Traffic/Mitigation: It states that vessels would follow Coast Guard requirements for operating in Puget Sound. Please summarize and provide a reference for these regulations.

Ortman, David

Response

A good source for this information is the "Puget Sound VTS User's Manual" developed by the Coast Guard. This manual can be requested from the Coast Guard at (206) 217-6040. Additional information (as of 8 June 2000) can also be found at: http://www.uscg.mil/d13/units/vts/psvts.html#INTRODUCTION

8.4.3 Remaining Adverse Impacts and Additional Measures

No substantive comments were received that specifically address this section.

8.5 Cumulative Impacts

Comment A-1.031

Section 8.3.4 p.8-12 The project proponent is encouraged to substantiate source need for this project other than delivery to Des Moines as the high-potential delivery point.

Washington Department of Natural Resources

Response

The Applicant's need is assumed, considering the effort and cost required to permit a mine, and the current level of development in the Puget Sound region.

8.6 Significant Unavoidable Adverse Impacts

No substantive comments were received that specifically address this section.

8.7 Citations

8.7.1 Printed References

U.S. Coast Guard. 1998. VTS User Manual. Vessel Traffic Service Puget Sound. Seattle, WA.

John A. Volpe National Transportation Systems Center. 1991. Port needs study (vessel traffic services benefits). Volume 2 – Appendices, Part 1. August. Cambridge, MA. Prepared for U.S. Coast Guard, Washington, DC.

8.7.2 Citations in Comments

See comment letters in Volumes 5 and 6 for references cited in comments.

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